

UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH CAROLINA
SPARTANBURG DIVISION

ROGER STEVENS, AS PERSONAL
REPRESENTATIVE OF THE ESTATE
OF JOHNIE STEVENS,

Plaintiff,

v.

THI OF SOUTH CAROLINA AT
CAMP CARE, LLC d/b/a LAKE
EMORY POST ACUTE CARE,
HUNT VALLEY HOLDINGS, LLC
f/k/a FUNDAMENTAL LONG-
TERM CARE HOLDINGD, LLC,
LYNETTE HILL, INDIVIDUALLY,
AND AS REPRESENTATIVE OF
THI OF SOUTH CAROLINA AT
CAMP CARE, LLC d/b/a LAKE
EMORY POST ACUTE CARE,
AND AETNA LIFE INSURANCE
COMPANY,

Defendants.

CASE NO.

**DEFENDANT AETNA LIFE INSURANCE COMPANY'S ANSWERS TO
LOCAL RULE 26.01 INTERROGATORIES**

Defendant Aetna Life Insurance Company by and through its undersigned counsel,
answering Local Rule 26.01, states as follows:

(A) State the full name, address and telephone number of all persons or legal entities who may have a subrogation interest in each claim and state the basis and extent of said interest.

ANSWER: None.

(B) As to each claim, state whether it should be tried jury or nonjury and why.

ANSWER: This is a nonjury case since Plaintiff seeks Medicare Advantage benefits and must first exhaust administrative remedies and then proceed to nonjury judicial review.

(C) State whether the party submitting these responses is a publicly owned company and separately identify: (1) each publicly owned company of which it is a parent, subsidiary, partner, or affiliate; (2) each publicly owned company which owns ten percent or more of the outstanding shares or other indicia of ownership of the party; and (3) each publicly owned company which the party owns ten percent or more of the outstanding shares.

ANSWER: Defendant Aetna Life Insurance Company is 100% owned by Aetna Inc., which is 100% owned by CVS Pharmacy, Inc., which is 100% owned by CVS Health Corporation (“CVS Health”), a Delaware corporation and publicly traded company. Based on filings with the Securities and Exchange Commission, we are not aware of any publicly held company that owns 10% or more of the outstanding common stock of CVS Health. CVS Health’s stock ticker symbol on the New York Stock Exchange is “CVS.”

(D) State the basis for asserting the claim in the division in which it was filed (or the basis of any challenge to the appropriateness of the division).

ANSWER: The alleged actions that form the basis for the causes of action allegedly took place in the Spartanburg Division.

(E) Is this action related in whole or in part to any other matter filed in this District, whether civil or criminal? If so, provide: (1) a short caption and the full case number of the related action; (2) an explanation of how the matters are related; and (3) a statement of the status of the related action. Counsel should disclose any cases which *may be* related regardless of whether they are still pending. Whether cases *are* related such that they should be assigned to a single judge will be determined by the Clerk of Court based on a determination of whether the cases: arise from the same or identical transactions, happenings, or events; involve the identical parties or property; or for any other reason would entail substantial duplication of labor if heard by different judges.

ANSWER: This action is not related to any other matter filed in this District Court.

(F) [Defendants only] If the defendant is improperly identified, give the proper identification and state whether counsel will accept service of an amended summons and pleading reflecting the correct identification.

ANSWER: N/A.

(G) [Defendants only] If you contend that some other person or legal entity is, in whole or in part, liable to you or the party asserting a claim against you in this matter, identify such person or entity and describe the basis of said liability.

ANSWER: None at this time. Defendant reserves the right to supplement this response should discovery reveal that some other person or legal entity may be liable.

DATED: February 10, 2025

Respectfully submitted,

By: /s/ Ashley R. Parr
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CERTIFICATE OF SERVICE

The undersigned certifies that a copy of the foregoing instrument was served upon the attorneys of record of all parties in accordance with Rule 5(b), Federal Rules of Civil Procedure, on this 10th day of February 2025.

/s/ Ashley R. Parr
Ashley R. Parr